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18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 OAKLAND DIVISION

21 THOMAS RAY WOODSON,
22
23 Plaintiff,
24 v.

25 J. RODRIGUEZ, *et al.*,
Defendants.

Case No. 4:07-CV-04925-CW

**STIPULATION AND ~~PROPOSED~~
ORDER RESETTING CASE
MANAGEMENT DATES**

Judge: The Honorable Claudia Wilken

Complaint Filed: September 21, 2007

Trial Date: June 27, 2011

Pursuant to Northern District Local Rules 7-12 and 16-2, counsel for Plaintiff Thomas R. Woodson and counsel for Defendants J. Rodriguez, E. Camarena, J. Parra, D. Vega, and Sergeant Kircher hereby submit this Stipulation and Proposed Order regarding case management dates and discovery proceedings.

WHEREAS, counsel for Mr. Woodson, Catharine B. Baker, has to take a leave of absence from her work with Morrison & Foerster LLP from August 1, 2010 through approximately November 1, 2010, for personal reasons;

WHEREAS, the parties agree that the interests of the parties and judicial economy would be best served by continuing the case management dates other than the trial and final pre-trial conference dates, as set forth below;

IT IS HEREBY STIPULATED AND AGREED by the parties, by and through their respective counsel, that:

1. The case management dates be reset as follows:

Event	Current Deadline	Stipulated Deadline
Deadline to add parties or claims	9/1/10	11/19/10
ADR session to be held by	10/1/10 (settlement conference currently set for 9/3/10)	12/17/10
Fact discovery cut-off	10/1/10	12/17/10
Expert disclosures (names, reports)	10/29/10	1/14/11
Expert rebuttal reports	11/19/10	2/1/11
Expert discovery cut-off	12/17/10	2/18/11
MSJ Hearing, CMC	2/3/11 at 2:00 p.m.	4/7/11 at 2:00 p.m., or such date thereafter as the Court designates.
Pretrial Conference	6/14/11 at 2:00 p.m.	same
Trial	6/27/11	same

2. Unless the parties agree otherwise in writing, no written discovery directed to any party or non-party propounded after the date of this stipulation shall be due before November 1, 2010. Depositions shall not be taken until after November 1, 2010.

3. Unless the parties agree otherwise in writing, any discovery propounded in this action by either party as of the date of this stipulation is not to be limited by this stipulation and can be the subject of any further negotiations and agreements between the parties and any necessary motions, including motions to compel.

Dated: July 23, 2010

Respectfully Submitted,

MATTHEW I. KREEGER
CATHARINE B. BAKER
JANELLE SAHOURIA
MORRISON & FOERSTER LLP

By: 

CATHARINE B. BAKER

Attorneys for Plaintiff
THOMAS RAY WOODSON

Dated: July 23, 2010

JOSE A. ZELIDON-ZEPEDA
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By: 

JOSE A. ZELIDON-ZEPEDA

Attorneys for Defendants
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PARRA, D. VEGA, AND SERGEANT
KIRCHER

PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.

Dated: 7/26/2010


HONORABLE CLAUDIA WILKEN
United States District Court Judge